

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

L.H., et al.,)	
)	
Plaintiffs,)	
)	Case No. 4:17-CV-00217-SPM
vs.)	
)	
JEFFERSON COUNTY, MISSOURI, et al.,)	
)	
Defendants.)	

**DEFENDANTS CORRECT CARE SOLUTIONS, LLC f/k/a CHC COMPANIES, INC.,
AND DR. GLYNN’S RESPONSE IN SUPPORT OF
MOTION TO ENFORCE SETTLEMENT**

COMES NOW Defendants Correct Care Solutions, LLC f/k/a CHC Companies, Inc. (hereinafter “CCS”) and Dr. “John Doe Glenn” (hereinafter “Dr. Glynn¹”) and provides the following Response in Support of Plaintiff Ciara Valentine’s Motion to Enforce Settlement Agreement [Doc. 85]:

1. Defendants CCS and Dr. Glynn join in Plaintiff Ciara Valentine’s Motion to Enforce Settlement [Doc. 85] and incorporate by reference all arguments made in the Memorandum in Support [Doc. 86].

2. Defendants further note that since December 20, 2017, when the mediation was held, all parties have proceeded forward with the understanding that a settlement had been reached and that the only issue that was still be resolved was the distribution of the settlement amongst the various Plaintiffs. This is evidenced not only by the ADR Compliance Report that was filed on December 26, 2017 [Doc. 79], but also the Consent Motion that was filed on January 23, 2018, asking for additional time to finalize the settlement documents [Doc. 81].

¹ Dr. Paul Glynn was improperly named as Dr. “John Doe” Glenn in the Fourth Amended Complaint.

3. The first notice that any of the Plaintiffs intended to contest the existence of a settlement came on February 20, 2018, two months after the mediation, when new counsel for Ms. Hendrickson indicated that she no longer believed the settlement was in the best interest of the minors.

4. However, the ultimate determination of what is in the best interest of the minors resides with the Court, not Ms. Hendrickson. RSMo. § 507.184.3.

5. Based on this, and the arguments made by Plaintiff Ciara Valentine in her Memorandum in Support of the Motion to Enforce Settlement [Doc. 86], Defendants CCS and Dr. Glynn are requesting the Court enter its Order enforcing the settlement reached at the mediation on December 20, 2017.

WHEREFORE, based on the above and foregoing, Defendants Correct Care Solutions, LLC f/k/a CHC Companies, Inc., and Dr. “John Doe Glenn” request an Order from this Court enforcing the settlement reached on December 20, 2017 and for such other relief the Court finds just and necessary.

Respectfully submitted,

/s/ Tracy M. Hayes

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GLYNN**

CERTIFICATE OF SERVICE

I HEREBY certify that on this 27th day of February, 2018, the foregoing was electronically filed with the Clerk of the District Court using the CM/ECF system, which will send notice of electronic filing to all registered attorneys of record.

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